

# WOKINGHAM TOWN COUNCIL

## RESPONSE TO THE DRAFT NATIONAL PLANNING POLICY FRAMEWORK

### A. Policy questions

Q. No.	Section	Consultation Question
1a	Delivering sustainable development	<p>The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.</p> <p>Do you: Strongly Agree/<del>Agree</del>/<del>Neither Agree or Disagree</del>/<del>Disagree</del>/<del>Strongly Disagree</del></p>
1b		<p><i>(Para 40) The Community Infrastructure Levy could provide greater freedom than S106 agreements, but we question whether this will be enacted within the timeframe of the Framework?</i></p> <p><i>(Para 23) Do local authorities have the expertise to judge all the "Strategic Priorities"? If they are not able to migrate their existing plans, this new "Local Plan" could take years to bring about and as the presumption is to approve any sustainable development if a Local Plan does not exist then we could be in a difficult position to stop some developments.</i></p> <p><i>Para 39 will be used by developers to reduce S106 payments on difficult to develop sites and that is all we have in Wokingham. All the easy ones are long gone, so some would argue that we get the pain but not the gain.</i></p>
2a	Plan-making	<p>The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.</p> <p>Do you: Strongly Agree/<del>Agree</del>/<del>Neither Agree or Disagree</del>/<del>Disagree</del>/<del>Strongly Disagree</del></p> <p><i>(Para 48) Who decides on the appropriateness of the Local Plan - an outside inspector - so Central Government could still tell LPAs what to do! "Localism" is not what it says on the tin.</i></p>

Q. No.	Section	Consultation Question
2c	Joint working	The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
2d		<i>Who arbitrates if a dispute? Answer: Central Government. Para 49 gives communities the power to set the agenda but only if they are in line with the Local Plan, which has to be in line with the National Plan - so much for local control! This will produce loads of work for lawyers.</i>
3a	Decision taking	Decision taking In the policies on development management, the level of detail is appropriate.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
3b		<i>The policy asks us to have more early discussions with developers and give them real guidance, so developers and their advisors will be coming to see us a lot more. We need Local Plans and Neighbourhood Plans ASAP.</i>
4a		Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
4b		What should any separate guidance cover and who is best placed to provide it?  <i>As a Town Council, in direct contact with the local community, we are best placed to and would like to be included as an Organisation to provide information</i>
5a	Business and economic development	The 'planning for business' policies will encourage economic activity and give business the certainty and confidence to invest.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
5b		<i>Para 71 calls for urgent need, but these Local Plans could take years. What happens in the meantime - a development free for all?</i>
5c		What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

Q. No.	Section	Consultation Question
6a		<p>The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.</p> <p>Do you: Strongly Agree/<del>Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>
7a	Transport	<p>The policy on planning for transport takes the right approach.</p> <p>Do you: Strongly Agree/<del>Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>
7b		<p><i>We believe that there should be safeguards to ensure that development must include assessments of traffic impacts.</i></p> <p><i>There is no mention of road development in the Framework. Should not there be a commitment to a road development plan to meet the requirements of, say, the Local Transport Plan?</i></p> <p><i>(Para 19) Public transport – the lack of emphasis on a shift from cars is questioned. Should not there be a firm commitment to “modal shift”, not just the statement to “make the fullest use of public transport”?</i></p> <p><i>How do we get our residents out of their cars? Until they do we will have congestion. Will this allow schemes with low or no car parking?, Probably, if they have cycle parking and a bus stop within 400 m.</i></p>
8a	Communications infrastructure	<p>Policy on communications infrastructure is adequate to allow effective communications development and technological advances.</p> <p>Do you: Strongly Agree/<del>Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>
8b		<p><i>More masts or fewer, but smarter, masts? Hopefully there are not many areas in Wokingham that do not have coverage.</i></p>
9a	Minerals	<p>The policies on minerals planning adopt the right approach.</p> <p>Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>

Q. No.	Section	Consultation Question
10a	Housing	The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
10b		<i>Local authorities should have control over their own housing strategy. Anything that changes the current position to achieve this should be encouraged.</i>
11a	Planning for schools	The policy on planning for schools takes the right approach.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
11b		<i>There does not appear to be a specific set of policies for planning for schools within the draft framework. The word "schools" is only mentioned six times in the entire document of some 19,400 words!</i>
12a	Design	The policy on planning and design is appropriate and useful.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
12b		<i>There is a question as to how we mix the old and the new under the policy on planning and design.</i>
13a	Green Belt	The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
13b		<i>(Para 146) In view of the contents of sections 2.6 and 2.7 of the National Policy Statement for Renewable Energy Infrastructure, the definition of "the wider environmental benefits associated with increased production of energy from renewable sources" appears to drive a coach and horses through protection of the Green Belt from a proliferation of wind turbines.</i>
14a	Climate change, flooding and coastal change	The policy relating to climate change takes the right approach.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>
14c		The policy on renewable energy will support the delivery of renewable and low carbon energy.  Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del>

Q. No.	Section	Consultation Question
14e		<p>The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities</p> <p>Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>
14g		<p>The policy on flooding and coastal change provides the right level of protection.</p> <p>Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>
15a	Natural and local environment	<p>Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment.</p> <p>Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>
15b		<p><i>There is little in the policy to prevent the proliferation of wind turbines on Green Belt land, with no "Local" control over such development.</i></p>
16a	Historic environment	<p>This policy provides the right level of protection for heritage assets.</p> <p>Do you: <del>Strongly Agree/Agree/Neither Agree or Disagree/Disagree/Strongly Disagree</del></p>
16b		<p><i>Just because it is old does not mean it will be kept. We question how this will affect buildings which are not listed, such as the Old School House in Wokingham. It could make it harder to resist a demolition application.</i></p>

Q. No.	Section	Consultation Question
17a	Impact Assessment	<p>The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions, you may provide general comments on the assessment in response to the following question:</p> <p>Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?</p> <p><i>We have a concern that the cost and time involved in assessing and comparing Local Authorities' existing Strategies and Plans with the Local Plan requirements, so as to ensure compatibility and compliance, have not been adequately assessed in the Impact Assessment. As a consequence, there could be a knock-on effect in the implementation of the necessary Local Plan that may leave a "free for all" for developers to exploit until the Local Plan is in place.</i></p>
18	Planning for travellers	<p>Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?</p> <p><i>Planning policy for travellers should be devolved entirely to the local authority.</i></p>